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Petition for Exception Request CFR 65.71(a)(2)

I respectfully petition relief from CFR 65.71(a)(2), which specifically states that to be eligible for a mechanic certificate and associated ratings, a person must, “Be able to read, write, speak, and understand the English language”, or in the case of an applicant who does not meet this requirement and who is employed outside of the United States by a U.S. air carrier, have his certificate endorsed, “Valid only outside the United States.”

I have been enrolled and completed the Aviation Maintenance (AMT) program at Portland Community College. The AMT program is an FAA-approved program that prepares students as an airframe and powerplant-rated mechanic. I completed all of my AMT program requirements this summer 2021 and I am eligible to take the written, oral, and practical examination.

I am a deaf person who communicates with American Sign Language or ASL. I am unable to speak English, but am able to read, write, and understand English. With the aid of an ASL interpreter, I have been able to perform all of the FAA-approved curriculum requirements for certification as an aircraft mechanic. I will meet all the requirements of CFR 65.71 except for the requirement that I speak English. Although I am deaf and speech impaired, this does not cause an adverse effect on safety. I am careful and diligent about my

work and more than able to interpret and apply written technical information. Even though I am unable to hear, I have successfully completed the AMT training and can effectively communicate in multiple settings in the Aviation environment with an interpreter.

An exemption from CFR 65.71(a)(2) would enable me to use an ASL interpreter to take the oral and practical examinations for the mechanic certificate and associated ratings, because I am deaf and speech impaired.

I would like to reference previous FAA exemption requests granted as precedence with an additional relevant quotation from another exemption request below:

- (1) Exemption No. 6015, Regulatory Docket No. 27810
- (2) Exemption No. 8324, Regulatory Docket No. FAA-2004-17769
- (3) Exemption No. 9951, Regulatory Docket No. FAA-2009-0943
- (4) Exception No. 11198, Regulatory Docket No. FAA-2014-0994

“...In Grant of Exemption Nos. 6015, 6840, and 8324 , the FAA found there are many aviation tasks that a person with hearing and speech impairments can perform without creating unsafe situations. The FAA determined that such disabilities would not present a safety hazard and that it is in the public interest to train and employ people with disabilities in jobs that they are capable of performing.” (Barbagallo, John, Acting Deputy Director Flight Standards Service: FAA Decision letter. Exemption No. 11199, Regulatory Docket No. FAA-2014-1013. March, 10th 2015. pp. 1)

Sincerely,

Daniel Turchin

A handwritten signature in black ink, appearing to read 'D. Turchin', with a long horizontal stroke extending to the right.

